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25 RASIER, LLC; and RASIER-CA, LLC

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF MICHAEL B.  
SHORTNACY IN SUPPORT OF  
DEFENDANTS' MOTION TO DISMISS  
CASES FOR FAILURE TO COMPLY WITH  
COURT ORDER**

This Document Relates to:

Date: October 31, 2025  
Time: 10:00 a.m.  
Courtroom: 6 – 17th Floor

*WHBE 2149 v. Uber Technologies, Inc., et al.*, No. 3:25-cv-05035-CRB

1 *Jane Doe LS 608 v. Uber Technologies,*  
2 *Inc., et al., No. 3:25-cv-05312-CRB*

3 *Jane Doe LS 609 v. Uber Technologies,*  
4 *Inc., et al., No. 3:25-cv-05328-CRB*

5 *Jane Doe LS 610 v. Uber Technologies,*  
6 *Inc., et al., No. 3:25-cv-05374-CRB*

7 *Jane Roe CL 178 v. Uber Technologies,*  
8 *Inc., et al., No. 3:25-cv-05537-CRB*

9 *Jane Roe CL 179 v. Uber Technologies,*  
10 *Inc., et al., No. 3:25-cv-05538-CRB*

11 *E.M. 3681 v. Uber Technologies, Inc., et*  
12 *al., No. 3:25-cv-05571-CRB*

13 *Jane Roe CL 182 v. Uber Technologies,*  
14 *Inc., et al., No. 3:25-cv-05628-CRB*

15 *Jane Roe CL 181 v. Uber Technologies,*  
16 *Inc., et al., No. 3:25-cv-05633-CRB*

**DECLARATION OF MICHAEL B. SHORTNACY**

I, Michael B. Shortnacy, declare pursuant to 28 U.S.C. § 1746:

1. I am over the age of 18 and am a resident of Los Angeles, California. I respectfully submit this declaration in support of Defendants Uber Technologies, Inc.’s, Rasier, LLC’s, and Rasier-CA, LLC’s (collectively, “Uber’s”) motion to dismiss the cases of certain Plaintiffs represented by Williams Hart & Boundas, LLP, Levin Simes, LLP, Cutter Law PC, and Cohen Hirsch, LP, for noncompliance with this Court’s order.

2. I am a partner at the law firm of Shook, Hardy & Bacon L.L.P., representing Uber in this MDL as well as in Judicial Council Coordination Proceeding No. 5188, *In Re: Uber Rideshare Cases*, Case No. CJC-21-005188 (the “JCCP”). I am a member in good standing of the Bar of the State of California, the Bar of the District of Columbia Court of Appeals, and the Bar of the State of New York. I make this declaration based upon matters within my own personal knowledge. If called as a witness, I could and would competently testify to the matters set forth herein.

3. On March 19, 2024, this Court entered Pretrial Order No. 10 (“PTO 10”) in this matter, requiring each Plaintiff to “submit a completed PFS, and executed Authorizations, through MDL Centrality.” ECF No. 348 at 4. PTO 10 required each Plaintiff whose case was a part of the MDL by March 26, 2024 to submit a PFS within 60 days of that date—i.e., by May 25, 2024. *Id.* at 5. Each Plaintiff who joined the MDL after March 26, 2024 has to submit a PFS within 30 days of joining. *Id.* at 6.

4. Attached to this declaration as **Exhibit A** is a table identifying 9 Plaintiffs who, as of the date of this Declaration, have failed to submit a Plaintiff Fact Sheet (“PFS”) by their deadline to do so. The Plaintiffs’ deadlines are identified in the table at Exhibit A.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on September 15, 2025 in Los Angeles, California.

**SHOOK, HARDY & BACON L.L.P.**

/s/ Michael B. Shortnacy

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